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February 28, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Magalie R. Salas, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Notice of *Ex Parte* Presentation by the
Personal Communications Industry Association and
Allied PCIA of California**

Numbering Resource Optimization – CC Docket No. 99-200

Dear Ms. Salas:

Pursuant to Sections 1.1206(b)(1) and (2) of the Commission's Rules, the Personal Communications Industry Association ("PCIA") and Allied PCIA of California, by their attorneys, submit this notice in the above-captioned docketed proceeding of an oral *ex parte* presentation made and written *ex parte* materials distributed on February 25, 2000 during a meeting with Yog Varma, Deputy Bureau Chief, Common Carrier Bureau, David Furth, Senior Legal Advisor, Wireless Bureau, and Les Selzer, Economist, Network Services Division, all of the Federal Communications Commission. The presentation was made by Harold Salters, Director of Government Relations, PCIA, Judith St. Ledger-Roty, Counsel to PCIA, Todd Daubert, Counsel to PCIA, David Wilson, Counsel to Allied PCIA of California, and Mike Brantley, Vice President – Affiliate Oper. Eng., Arch Communications. Bill Wiginton, Director of Interconnection, Paging Network, Inc., and Mark Stachiw, General Counsel, Airtouch Paging, participated via teleconference. Copies of the written materials distributed at the meeting are attached hereto.

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Magalie R. Salas
February 28, 2000
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During the presentation, PCIA and Allied PCIA of California discussed concepts presented in and raised by the attached presentations entitled "Numbering Optimization and Competition," "Number Resource Optimization" and "State Number Conservation Measures Must Continue To Be Subject to National Guidelines, Standards and Procedures." PCIA and Allied PCIA of California discussed ways in which the Commission could move expeditiously to ensure efficient number utilization while ensuring that all carriers have timely and nondiscriminatory access to numbering resources. The timing, logistics and potential scope of the first order to be released in the above-captioned proceeding were also discussed.

Pursuant to Sections 1.1206(b)(1) and (2), an original and two copies of this *ex parte* notification (with attachments) are provided for inclusion in the public record of the above-referenced proceeding. We would be pleased to provide additional copies of the written materials upon request. Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Todd D. Daubert", with a long horizontal line extending to the right.

Judith St. Ledger-Roty
Todd D. Daubert
Counsel to PCIA

cc: International Transcription Services
Yog Varma
David Furth
Les Selzer

Numbering Optimization and Competition



Personal Communications
Industry Association

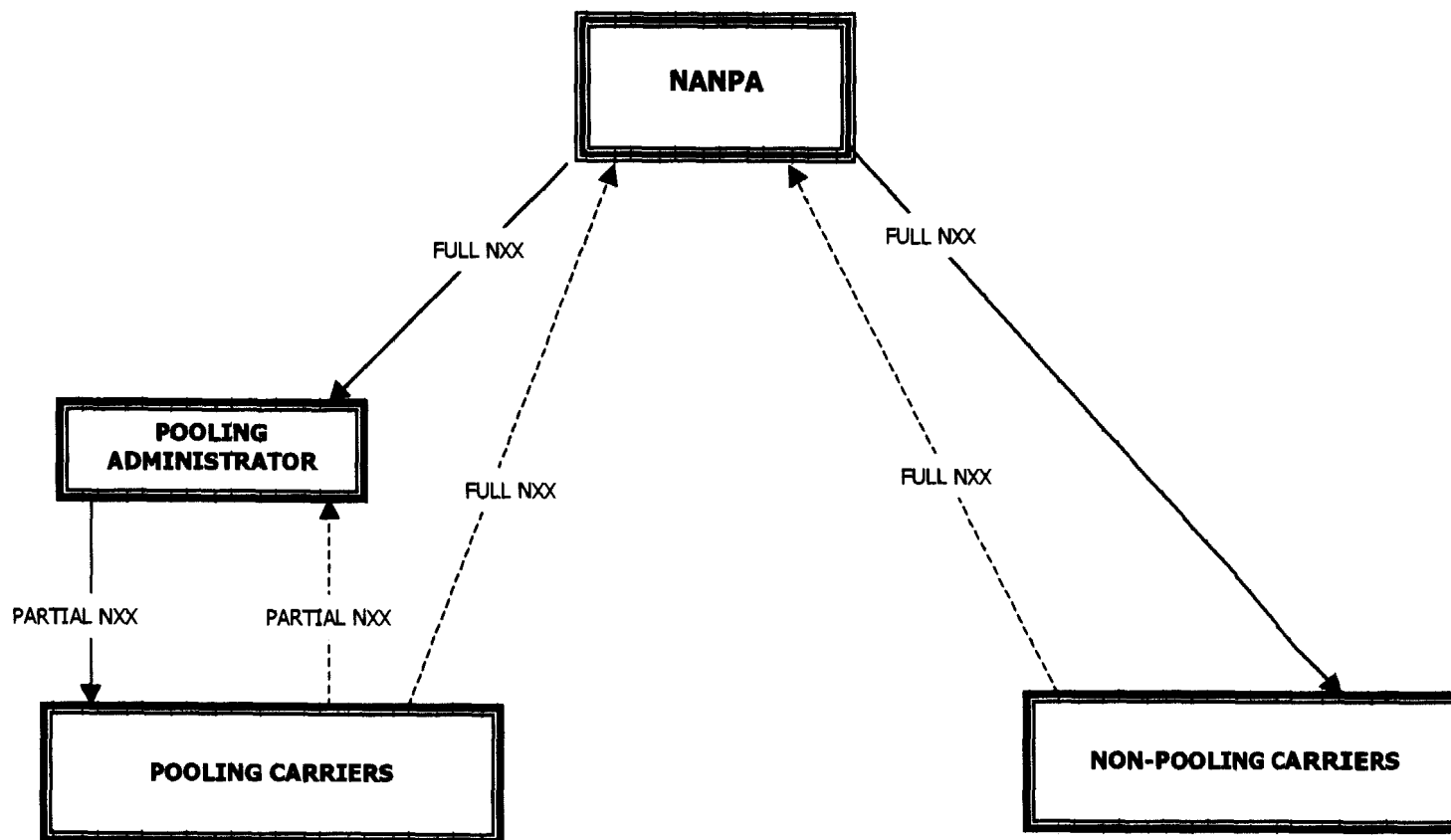
Ex Parte Presentation in CC Docket No. 99-200

February 2000

All Carriers Must Be Assured Non-Discriminatory and Timely Access To Telephone Numbers

- The FCC should, in all circumstances, assure that telephone numbers are available on a timely, non-discriminatory basis.
- There must always be a seamless path to ensure that as area codes exhaust, growth area codes are ready.
- PCIA has proposed a mechanism that would create a seamless path to growth area codes for both non-LNP- and LNP-capable carriers.

Model Pooling Structure



The Central Office Code Administrator ("CO Code Administrator") allocates full NXX codes to both non-LNP-capable carriers and to the Pooling Administrator, which in turn allocates partial codes to LNP-capable carriers.

PCIA's Model Pooling Structure Would Help to Ensure that All Carriers Have Non-Discriminatory and Timely Access To Telephone Numbers

- PCIA's proposal, in conjunction with the FCC's utilization proposal, achieves the following objectives of various industry segments:
 - It facilitates the continuation of 7-digit dialing within individual area codes for all industry segments for an additional period of time (proposed by some states);
 - It allows number pooling to be implemented (proposed by some states, CLECs and industry groups);
 - It eliminates the need for number rationing when implemented properly (all carriers);
 - It preserves non-discrimination in allocation and utilization of numbering resources (all carriers); and
 - It alleviates pressure to require number take-backs outside of traditional uses (*e.g.*, implementation of area code relief in the form of a geographic split).

Non-LNP Capable Carriers Should Not, and Cannot, Be Required To Receive, Port, or Give-Back 1,000 Number Blocks

- LNP-capability is a prerequisite to 1,000 block number pooling.
- Wireless carriers are not LNP-capable:
 - CMRS carriers will not be LNP-capable before 2002
 - No likelihood that stand alone paging carriers will be LNP-capable in the foreseeable future.
- Therefore, wireless carriers, like all carriers that are not LNP-capable, must not be required to take 1,000 blocks from the pool or to contribute 1,000 blocks to the pool.
- Wireless and other carriers that are not LNP-capable must be able to receive whole 10,000 blocks of numbers available within the NPA from the CO Code Administrator.

Maintaining Federal Authority Over Numbering Is Crucial

- The Commission must not abdicate its plenary authority over numbering to the States.
- To the extent government intervention is necessary to advance number optimization, carriers should be subject to federal authority, and reporting under a national framework, instead of up to 50 separate state commissions.

A Uniform National Approach to Number Administration and Optimization is Crucial to Competition

- Carriers should be required to report to only one entity - the NANPA -- to assure uniform guidelines and consistent reporting nationwide.
- Reporting of information, including Part 4 of COCUS (confirmation of code activation), to the NANPA should be mandatory: No COCUS, no numbers.
- COCUS 2000 and further NANPA/NANC efforts to develop the hybrid COCUS make individual State information requests inefficient and counterproductive.

To the Extent States are Permitted to Collect Number Utilization Data, the FCC Must Establish a Uniform National Reporting Template

- Carriers must not be burdened with dozens of inconsistent and varied State information requests asking for information in different formats (e.g., paper vs. electronic, Excel spreadsheet vs. Word questionnaire, etc.) with unrealistic due dates.
- State reporting at the thousand or hundred block level is overly burdensome for carriers that are not LNP-capable.